

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF INDIANA**

LARRY G. PHILPOT,)	Case No. 3:15-cv-00145 JD-CAN
Plaintiff,)	
)	
v.)	
)	
GRAY TELEVISION, INC.,)	Judge Jon E. DeGuilio
)	Magistrate Judge Christopher A.
Defendant.)	Nuechterlein

GRAY TELEVISION GROUP, INC.,)	
)	
Third-Party Plaintiff,)	
)	
v.)	
)	
MULTIMEDIA GRAPHIC NETWORK,)	
INC. d/b/a MGN Online,)	
)	
Third-Party Defendant.)	

FILED
MAY 04 2016
AT _____
ROBERT N. TRGOVICH, CLERK ^M
U.S. DISTRICT COURT
NORTHERN DISTRICT OF INDIANA

PRO SE PLAINTIFF'S MOTION TO QUASH ALL THIRD PARTY SUBPOENAS

1. On April 29, 2016, opposing counsel filed NOTICE OF FILING DISCOVERY IN CASE WITH PRO SE PARTY PLEASE TAKE NOTICE that, pursuant to N.D. Ind. L.R. 26-2, Gray Television Group, Inc. hereby files discovery documents served to various parties in connection with the above captioned case..
2. Plaintiff Philpot has been in the process of retaining Counsel and according to the order of this Honorable Court, Plaintiff has until May 4, 2016 to notify the Court whether he will proceed and find new Counsel.
3. Plaintiff Philpot has retained new Counsel, but Counsel is not yet up to speed on the case at bar.

4. Plaintiff's Third Party Subpoenas are little more than a fishing expedition designed to harass and affect the career of Plaintiff Philpot, and are overly broad and full of overreach.
5. Plaintiff's Willie Nelson Photograph was registered on September 5, 2012, yet Gray has demanded all correspondence with Philpot's associates in the music industry since 2008.
6. Further, Gray convened a Deposition of the Publicist of Willie Nelson, despite her having no knowledge of the lawsuit, and demanding that she appear instead of caring for her spouse who is undergoing chemotherapy. This annoyance lasted sixteen minutes, and all that Gray learned is that Mr. Willie Nelson's website has images that are free to use for media companies.
7. Gray has boasted that their attorneys are being paid by insurance companies and they aren't worried about costs.
8. Defendant Gray is using these overly broad third party subpoenas to harass and to paint Plaintiff Philpot as litigious, and ultimately will affect Plaintiff's access to events, as entertainment publicists do not have time to deal with this nonsense that they have no involvement in whatsoever. Plaintiff is not, nor was ever an employee of any of the recipients of the third party subpoenas.
9. Thereupon, Pro Se Plaintiff respectfully asks this Honorable Court to Quash the current subpoenas as meritless and overly broad.

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DECLARATION OF LARRY PHILPOT

I, Larry Philpot, hereby declare the following under the penalty of perjury pursuant to 28 U.S.C. § 1746:

1. I am the Pro Se plaintiff in this matter and am fully familiar with all facts presented here.
2. All statements are true and accurate.
3. I certify under penalty of perjury that the foregoing and all attachments is true and correct.

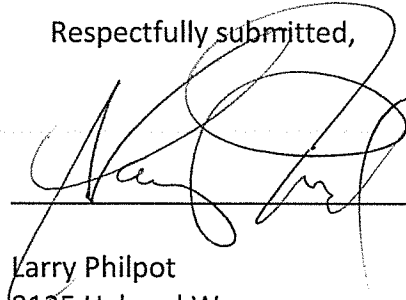
Dated: May 3, 2016

Respectfully submitted,

Larry Philpot, Pro Se

Dated: May 3, 2016

Respectfully submitted,

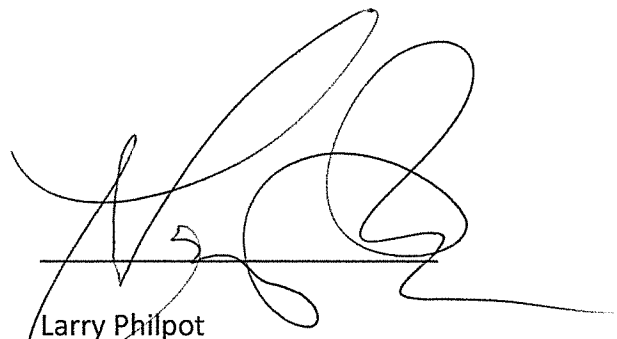
A handwritten signature in black ink, appearing to read 'Larry Philpot', is written over a horizontal line.

Larry Philpot
8125 Halyard Way
Indianapolis, IN 46236
Larry@behindthemusic.net
317-567-1338

CERTIFICATE OF SERVICE

Under penalty of perjury, I hereby certify that I have served a copy of the foregoing by email
upon the following law firm, May 3, 2016.

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